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*Attorneys for Defendants  
William Kuloloia and Jennifer Nash*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

Gerardo L. Perez,

Plaintiff,

v.

Jennifer Nash, *et al.*,

Defendants.

Case No. 2:19-cv-01181-GMN-BNW

**DEFENDANTS' UNOPPOSED MOTION  
TO EXTEND STAY FOR SETTLEMENT  
PURPOSES (SECOND REQUEST)**

Defendants William Kuloloai and Jennifer Nash (collectively "Defendants") the Office of the Attorney General, by and through counsel, Aaron D. Ford, Attorney General for the State of Nevada, and Wade J. VanSickle, Deputy Attorney General, hereby move to extend the stay for an additional forty-five (45) days for settlement purposes.

On June 18, 2020, the Court issued an order staying the case for ninety (90) days so that the parties could participate in an early mediation conference. ECF No. 4. On August 4, 2020, the Court extended the stay until two (2) days after the Inmate Early Mediation Conference (EMC), October 20, 2020. ECF No. 9

On October 16, 2020, as a result of the early mediation conference, the parties reached an agreement in which this matter will be dismissed. ECF No. 15. The Court also ordered the settlement documents to be filed by November 30, 2020. *Id.*

1 On October 19, 2020, Defendants filed an Unopposed Motion to Extend Stay for  
2 Settlement Purposes (First Request) moving the Court to extend the stay forty-five (45)  
3 days, or until December 4, 2020. ECF No. 16.

4 On October 23, 2020, the Court issued an order extending the stay until December  
5 4, 2020. ECF No. 17.

6 Plaintiff was recently transferred from Saguaro Correctional Center (SCC) in Eloy,  
7 Arizona to High Desert State Prison (HDSP) in Indian Springs, Nevada. Furthermore, in  
8 compliance with Governor Steve Sisolak's latest mandates, the Office of the Attorney  
9 General has limited access to its mail room. These two factors have delayed the Parties'  
10 efforts in executing and filing the stipulation and order for dismissal.

11 Therefore, Defendants request that the stay be extended an additional forty-five (45)  
12 days, from December 4, 2020, to January 18, 2021.

13 DATED this 30th day of November, 2020.

14 AARON D. FORD  
15 Attorney General

16 By: /s/ Wade J. VanSickle  
17 Wade J. VanSickle (Bar No. 13604)  
Deputy Attorney General  
*Attorneys for Defendants*

18 **IT IS SO ORDERED.**

19 **IT IS FURTHER ORDERED** that in light of  
20 the parties' settlement, all pending motions in  
21 this case, (ECF Nos. 3, 7-8, 10-11, 13), are  
**DENIED without prejudice as moot.**

22 Dated this 2 day of December, 2020.

23  
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25  
26   
27 Gloria M. Navarro, District Judge  
28 UNITED STATES DISTRICT COURT

**CERTIFICATE OF SERVICE**

I certify that I am an employee of the State of Nevada, Office of the Attorney General, and that on November 30, 2020, I electronically filed the foregoing **DEFENDANTS' MOTION TO EXTEND STAY (SECOND REQUEST)** via this Court's electronic filing system. Parties that are registered with this Court's electronic filing system will be served electronically.

Gerardo Perez (NDOC #85720)  
High Desert State Prison  
P.O. Box 650  
Indian Springs, NV 89070  
**HDSP\_LawLibrary@doc.nv.gov**  
*Plaintiff, Pro Se*

/s/ Sheri Regalado  
Sheri Regalado, an employee of the  
Office of the Nevada Attorney General